

In the Matter of )  
 )  
Numbering Resource Optimization ) CC Docket No. 99-200

July 10, 2000

## TABLE OF CONTENTS

	<u>Page</u>
I. INTRODUCTION AND SUMMARY.....	1
II. THE COMMISSION SHOULD DEFER THE EFFECTIVE DATE OF PORTIONS OF ITS NUMBERING RESOURCE RULES .....	2
III. THE DEMURRAL RELIEF REQUESTED BY QWEST CAN BE SUPPORTED BY A VARIETY OF PROCEDURAL VEHICLES.....	6
A. An Extension Of Time Or Deferral, Coincident With The Reconsideration Process, Is Appropriate .....	6
B. A Stay Of The Effective Date Of The Commission's Rules During The Reconsideration Process Is Appropriate.....	7
C. Temporary Forbearance Would Also Be Appropriate .....	11
IV. CONCLUSION .....	12

In the Matter of )  
 )  
Numbering Resource Optimization ) CC Docket No. 99-200

## I. INTRODUCTION AND SUMMARY

Qwest Corporation (“Qwest”)<sup>1</sup> requests the Federal Communications Commission (“FCC” or “Commission”) defer the effective date of 47 C.F.R. Sections 52.15(f)(1)(vi) (definition of “reserved numbers”) and (f)(5) (utilization reporting requirement) of its Numbering Resource Optimization Order,<sup>2</sup> at least until the conclusion of the reconsideration process. The sections referenced warrant serious reconsideration given their material effect on current carrier practices, their potential harm to subscribers, and, in the case of the reporting requirements, the inability to accomplish the desired result according to the currently-mandated timeline.

The relief requested by Qwest can be analyzed and granted through any one of a number of theories. As discussed more fully below, these could include an

<sup>1</sup> On June 30, 2000, U S WEST, Inc., the parent and sole shareholder of U S WEST Communications, Inc., merged with and into Qwest Communications International Inc. Further, on July 6, 2000, U S WEST Communications, Inc. was renamed Qwest Corporation.

extension of time or deferral of the effective date of the rules; a waiver or a stay of the effective date; or a temporary forbearance from enforcement of the rules.

## II. THE COMMISSION SHOULD DEFER THE EFFECTIVE DATE OF PORTIONS OF ITS NUMBERING RESOURCE RULES

An extension of time or a deferral of the effective date of the above-referenced rules is warranted since it is highly likely that the Commission will modify both of the above-referenced rules on reconsideration. The number reservation definition, for example, is infirm from two perspectives. First, it is antithetical to the current method in which numbers are reserved and held for customers. Over years, carrier number reservation practices have built up customer expectations. Especially for large businesses and governments, the Commission's rules, as currently written, will create havoc with their planning and implementation processes *vis-à-vis* the deployment of telecommunications and related services.<sup>3</sup>

---

<sup>2</sup> In the Matter of Numbering Resource Optimization, Report and Order and Further Notice of Proposed Rulemaking, 15 FCC Rcd. 7574 (2000) ("NRO Order").

<sup>3</sup> Qwest is confident that it is unaware of the volume of correspondence the Commission must have already received on this issue; however, Qwest is aware of some of the correspondence. See e-mail from James D. Mullins, Emergency Medical Services Authority, to FCC, no date (but around May 1, 2000), expressing concern over the FCC's 45-day reservation rule and its effect on business operations, including five-digit dialing within business' operations; letter from Harris County Hospital District, to Magalie Roman Salas, dated May 4, 2000, expressing concern over SBC Communications, Inc.'s ("SBC") communication to them that they may not be able to reserve the telephone number blocks they deem necessary to accommodate five-digit dialing within their operations; letter from SBC to Magalie Roman Salas, dated June 1, 2000, associating a letter to Mr. L. Charles Keller, Chief of Network Services Division, in which SBC expressed concern over the FCC's reservation rule in light of its existing contractual relationships and customer needs. And compare letter from Norman D. Cunningham, Assistant Superintendent, Support Services, Cypress-Fairbanks Independent School District, to Magalie Roman Salas, dated May 1, 2000, expressing concern with the FCC's

Second, most carriers currently do not have the kind of tracking/tickler systems<sup>4</sup> necessary to allow for the transfer of a number from a reserved status to a non-reserved status at the end of a 45-day period.<sup>5</sup> Such a system will have to be created, tested and implemented before the Commission's rule could be implemented.

Thus, while Qwest will be asking the Commission to reconsider its substantive definition of reserved numbers, in light of the pernicious affect those rules will have on customers and their planning and telephone numbering needs, Qwest asks here for an extension of the effective date of the rule because Qwest lacks the ability to implement it. Ideally, this extension would last through the entire reconsideration process. Clearly, more time than is permitted by the July 17, 2000 effective date will be necessary to create the necessary systems capabilities to track reserved numbers.

---

"assigned number" designation because it would interfere with number assignments over the course of the years as the School District expands and adds numbering resources that need to be harmonized with existing resources and dialing patterns.

<sup>4</sup> Currently, at least in Qwest's territory, state tariffs allow customers to reserve numbers but place no time frame on the amount of time that numbers can be held in such status. Thus, under current number reservation practices, no "tracking" system exists.

<sup>5</sup> Under the FCC's rules, a number can only be in one category or another. 47 C.F.R. § 52.15(f)(1). Thus, at the end of the 45-day period, the number needs to be "pulled" from the one category and put into another. See NRO Order, 15 FCC Rcd. at 7678 ¶ 232.

Should any "time certain" ultimately be associated with the definition of reserved numbers, a tracking/tickler system would need to be designed and deployed. **Qwest estimates it will take something more than a year and approximately \$4.5 million to create such a system and will be asking for reconsideration of this requirement in the near future.**

Similarly, Qwest expects that the Commission will reconsider the August 1, 2000 reporting date currently required for the submission of utilization reports to the North American Numbering Plan Administrator (“NANPA”) and will change/modify or waive that date such that the first reports under the new reporting system will not occur until next year.<sup>6</sup> Key to the Commission’s decision to proceed with new reporting requirements was the fact that data collection and reporting would be automated.<sup>7</sup>

As is obvious from the Neustar Petition, and which Qwest can separately attest to, current number management Operations Support Systems (“OSS”) are not designed to accommodate the kind of data collection and reporting envisioned by the Commission. And proceeding even with what Neustar calls the “Limited COCUS Solution,”<sup>8</sup> will be highly labor intensive (i.e., requiring manual efforts) and

---

<sup>6</sup> See Neustar, Inc. Petition for Compensation Adjustment, Request for Approval of Implementation Schedule and Emergency Request for Interim Relief, filed June 30, 2000 (“Neustar Petition”). At Attachment page 4-3, Neustar outlines a “revised” schedule for reporting indicating that it could design and deploy a new reporting system by January of next year, to be “available for February 1, 2001 data collection cycle.”

<sup>7</sup> The Commission has acknowledged the importance of automation in this area and has stated “that for any reporting system to operate efficiently, all carriers must report electronically. As a consequence, we believe that all or virtually all carriers should use electronic means to track their use of numbering resources. With electronic tracking of numbers, the level of detail contained in reports to the NANPA is **largely a matter of the up-front programming effort in designing a tracking system and preparing reports from it.**” (Emphasis added)

NRO Order, 15 FCC Rcd. at 7605 ¶ 72.

<sup>8</sup> Neustar Petition at Attachment page 4-4, stating that “Due to the vast quantity of data to be collected from thousands of service providers, NANPA will not accept any service provider submission that does not conform to the [Central Office Code

extremely expensive.

It is clear that there simply has not been sufficient time between the release of the Commission's NRO Order and the July 17, 2000 effective date for carriers and the NANPA to: (a) socialize the requirements of a utilization report, i.e., the elements to be reported; (b) agree on the ability to modify or manipulate the look/feel of such report; and (c) make the changes internally to accommodate the agreed-upon reporting elements.<sup>9</sup> It is obvious that more discussion and negotiations are necessary to resolve with the NANPA the exact reporting elements and format.<sup>10</sup>

---

Utilization Survey] forms, associated spreadsheets, or [Electronic File Transfer] format as defined by NANPA" (footnote omitted). And see note 10, infra.

<sup>9</sup> See letter from John R. Hoffman, NANC Chair, to Mr. Lawrence C. Strickling, Chief, Common Carrier Bureau ("Bureau"), FCC, dated June 21, 2000.

<sup>10</sup> For example, Qwest has received Microsoft Excel spreadsheets from the NANPA which contain many formatting "macros." Some of these macros control spreadsheet elements that can be considered fairly minor, such as color scheme or embedded "help" text. However, other macros control more material items, such as allowing for the insertion and analysis of additional thousand block-specific information. These more complex macros make it more difficult for Qwest to directly import data from a different source -- such as another Excel spreadsheet or data file. To complete the recently-submitted NANPA spreadsheet, then, will require additional amounts of manual labor to verify the accuracy of the data within the spreadsheet. While this matter might easily be worked through in negotiations with NANPA, the timeline associated with the reporting obligation has simply been inadequate to accomplish such negotiations.

In a similar vein, the proposed NANPA form requires that a carrier, such as Qwest, populate the name of the assignee of intermediate numbers. While Qwest has this information in its possession, it does not currently reside in the primary numbering database that would be used to respond to the NANPA numbering report(s). To create the ability to conform to the current NANPA proposal would be very expensive and, in Qwest's opinion, not warranted by any purported "benefit."

Moreover, formal comments on the data collection requirements associated with any proposed NANPA form are themselves not even required until September 5<sup>th</sup> of this year<sup>11</sup> -- more than a month after utilization data is currently required to be submitted to the NANPA, presumptively through an automated electronic collection and submission process.

For these reasons, Qwest requests a waiver of the August 1, 2000 reporting obligation, with reports being required no earlier than February 1<sup>st</sup> of next year or until a certain amount of time after the NANPA situation is worked through.

A delay in the effective date of these two rules will not harm the public. A delay would better accommodate the carriers affected by the Commission's mandates, which, in some cases, requires compliance with standards that are not currently embedded in industry practices or current OSSs. Qwest believes that logic and equity compels the conclusion that its requested relief be granted.

### III. THE DEMURRAL RELIEF REQUESTED BY QWEST CAN BE SUPPORTED BY A VARIETY OF PROCEDURAL VEHICLES

#### A. An Extension Of Time Or Deferral, Coincident With The Reconsideration Process, Is Appropriate

The Commission can grant an extension of time of the effective date of a rule, and it has done so when such has been in the "public interest."<sup>12</sup> As the facts and

---

<sup>11</sup> The Office of Management and Budget ("OMB") recently granted, on an emergency basis, the data collection requirements associated with the August 1, 2000 report (65 Fed. Reg. 41461, July 5, 2000), which date cannot be met. Data collection and reporting obligations associated with the "revised NANPA form" for next year (*i.e.*, February 2001) are required to be submitted on September 5<sup>th</sup> of this year. 65 Fed. Reg. 41666, July 6, 2000. As is obvious from the above note 10, Qwest will be opposing certain of the form's requirements as not being in conformity with the Commission's estimated reporting burden.



arguments in this filing make clear, the case for a deferral of the effective date (or enforcement) of the two above-challenged rules is strong, under either the public interest standard or the more traditional Virginia Petroleum Jobbers standard. The Commission should grant a waiver or an extension of time until the conclusion of the reconsideration process.

B. A Stay Of The Effective Date Of The Commission's Rules During The Reconsideration Process Is Appropriate

The Commission has authority to specify an effective date for new rules and to change that date at a later time. While the Administrative Procedure Act (“APA”) states that the effective date for substantive rules may generally be no sooner than 30 days after the rules are published in the Federal Register,<sup>13</sup> neither that statute nor the Telecommunications Act of 1996 (the “Act”) restricts the Commission from setting a later date, or from postponing the original effective date. Indeed, Section 1.103 of the Commission’s rules expressly provides for designating a later effective date in response to a request from any party.<sup>14</sup>

---

<sup>12</sup> See In the Matter of Regulatory Treatment of LEC Provision of Interexchange Services Originating in the LEC’s Local Exchange Area and Policy and Rules Concerning the Interstate, Interexchange Marketplace, Order, 13 FCC Rcd. 6427, 6428 ¶ 3 (1998) (“IXC Separate Affiliate Order”). In this case, the Bureau did not address the process associated with the granting of the relief as one involving a “stay” or the correspondent Virginia Petroleum Jobbers standard. See Virginia Petroleum Jobbers Association v. Federal Power Commission, 259 F.2d 921, 925 (D.C. Cir. 1958). Under that test, a petitioner must demonstrate that: (1) it likely will succeed on the merits on review; (2) it will suffer irreparable harm if a stay is not granted; (3) other interested parties will not be harmed if the stay is granted; and (4) the public interest favors grant of a stay.

<sup>13</sup> See 5 U.S.C. § 553(d).

<sup>14</sup> “[T]he Commission, on its own motion or on motion by any party, may designate an effective date for its actions that is either earlier or later [in time] than the date

Generally, the Commission will stay the effective date of its rules or orders upon a showing of “good cause.”<sup>15</sup> There are various tests that have been enunciated for meeting that standard. However, it is fair to say that the standard is somewhat flexible, especially under Section 1.103.<sup>16</sup> It is true that the Commission will stay the effective date of an order if it is persuaded that serious issues are present that warrant resolution prior to enforcement of the rule, without necessarily applying the Virginia Petroleum Jobbers factors. As is clear from the above arguments, such issues are presented here.<sup>17</sup>

For example, the Commission has granted a stay where, “after adoption of the rule, the Commission concluded that its implementation may lead to

---

of public notice [of such action].” (Footnote omitted.) The Commission adopted Section 1.103 to make clear it has “broad discretion to designate the effective dates of its actions.” (Citation omitted.) In the Matter of Addition of new Section 1.103 to the Commission’s Rules of Practice and Procedure; Amendments to Section 1.4(b) of those Rules, Memorandum Opinion and Order, 49 RR (P&F) 2d 225, 226-27 ¶ 8 (1981).

<sup>15</sup> See 47 C.F.R. § 1.429(k).

<sup>16</sup> See 47 C.F.R. § 1.103(a).

<sup>17</sup> For example, in addition to the more recent cases discussed below, the Commission has granted stays of effective dates of orders in the following cases without addressing the four-part injunctive relief test enunciated in Virginia Petroleum Jobbers. See In the Matter of Amendment of Part 22 of the Commission’s Rules Relating to License Renewals in the Domestic Public Cellular Radio Telecommunications Service, Order, 8 FCC Rcd. 8135, 8136 ¶ 1 (1993) (rules stayed “in order to permit [certain rule requirements] to be considered more fully on reconsideration”); In the Matter of Amendment of Part 76 of the Commission’s Rules Concerning Carriage of Television Broadcast Signals by Cable Television Systems, Order, 2 FCC Rcd. 603 (1986) (effective date of must-carry rules stayed to address cable system concerns).

unanticipated and unintended consequences.”<sup>18</sup> Surely, this rationale applies to the implementation of the FCC’s 45-day reservation rule. Given the paucity of record evidence on the impact to customers of such a short reservation period, the marketplace consequences are clearly unanticipated and unintended by the Commission. In such circumstances a deferral of the effective date of a rule (or a stay of its implementation) is clearly warranted.<sup>19</sup>

The Commission has determined that a stay is warranted to avoid premature compliance with a questionable rule<sup>20</sup> and when deferring implementation would “allow the Commission to develop a complete record . . . and make a more informed decision.”<sup>21</sup> The Commission has concluded that it would grant a stay in order to avoid industry and consumer confusion.<sup>22</sup> All of these criteria would support

---

<sup>18</sup> See Policy and Rules Concerning the Interstate, Interexchange Marketplace; Implementation of Section 254(g) of the Communications Act of 1934, as amended, Order, 12 FCC Rcd. 15739, 15742 ¶ 7 (1997) (citations omitted).

<sup>19</sup> See In the Matter of Policies and Rules Concerning Unauthorized Changes of Consumers’ Long Distance Carriers, Order, 11 FCC Rcd. 856 (1995) (“Stay Order”). And see In the Matter of Rules and Policies and Rules Regarding Calling Number Identification Service -- Caller ID, Order and Fourth Notice of Proposed Rulemaking, 10 FCC Rcd. 13796 (1995) (extending deadline by seven months); In the Matter of Guidelines for Evaluating the Environmental Effects of Radiofrequency Radiation, First Memorandum Opinion and Order, 11 FCC Rcd. 17512 (1996) (extending deadline by ten months).

<sup>20</sup> Stay Order, 11 FCC Rcd. at 857 ¶ 2 (“We believe the public interest would best be served by ruling on the issues raised in the pending petitions for reconsideration before requiring affected parties to take actions to comply.”)

<sup>21</sup> Id. (rule stayed “to develop a complete record upon which we can conduct a meaningful cost-benefit analysis and make a more informed decision”).

<sup>22</sup> Id. More recently, the Commission recently granted an extension of time with respect to certain Customer Proprietary Network Information (“CPNI”) rules where the Commission concluded “that it serve[d] the public interest to extend the deadline by which [it would] begin to enforce [its] rules . . . so that [it could]

changing the effective date associated with the 45-day number reservation rule and the utilization reporting requirement grounded in thousand block reporting.

Qwest's request also demonstrates "good cause" for an extension/waiver (under the more traditional waiver analysis).<sup>23</sup> An applicant for a waiver must demonstrate that special circumstances warrant a deviation from the general rule and that such deviation will serve the public interest.<sup>24</sup>

The Commission has recognized that the unavailability of a product from a manufacturer is an appropriate ground for finding good cause.<sup>25</sup> While the current

---

consider recent proposals to tailor [its] requirements more narrowly and to reduce burdens on the industry . . . . By delaying the date of enforcement until after the Commission acts upon reconsideration petitions, parties will have the opportunity to comment on [commentors'] proposed alternatives or make proposals of their own." In the Matter of Implementation of the Telecommunications Act of 1996: Telecommunications Carriers' Use of Customer Proprietary Network Information and Other Customer Information, Order, 13 FCC Rcd. 19390, 19391 ¶ 4 (1998).

<sup>23</sup> See 47 C.F.R. § 1.3.

<sup>24</sup> Northeast Cellular Telephone Co. v. FCC, 897 F.2d 1164, 1166 (D.C. Cir. 1990); WAIT Radio v. FCC, 418 F.2d 1153, 1158 (D.C. Cir. 1969), cert. denied, 409 U.S. 1027 (1972).

<sup>25</sup> For example, the Bureau has granted waivers to various small local exchange carriers in connection with the conversion to 4-digit Carrier Identification Code implementation. In those waivers, the Bureau recognized that the products these companies needed to accomplish the upgrades to their individual networks were not readily available from switch manufacturers, and that was going to cause the companies a delay in meeting the Commission-mandated schedule. See, e.g., Clarks Telecommunications Co., et al.; Petitions for Waiver of the Four-Digit Carrier Identification Code (CIC) Implementation Schedule, 12 FCC Rcd. 20205 (1997); Cuba City Telephone Exchange Company, et al.; Petitions for Waiver of the Four-Digit Carrier Identification Code (CIC) Implementation Schedule, 12 FCC Rcd. 21794 (1997); Frontier Communications of Lakeshore, Inc.; Petitions for Waiver of the Four-Digit Carrier Identification Code (CIC) Implementation Schedule, 13 FCC Rcd. 108 (1997); MoKan Dial, Inc.; Petitions for Waiver of the Four-Digit Carrier Identification Code (CIC) Implementation Schedule, 13 FCC Rcd. 327 (1998). Similarly, when carriers were attempting to implement Originating Line Screening

situation -- insofar as the utilization reporting process is concerned -- does not actually involve the lack of availability of an input necessary for compliance, the inability of the NANPA to process the information once received does suggest an output problem that needs to be reconciled before any data reporting is meaningful or helpful.

For all these reasons, the Commission should modify the effective date of the two rules challenged above.

C. Temporary Forbearance Would Also Be Appropriate

Section 10 of the Act requires the Commission to forbear from applying any provision of the Act if the agency determines that certain criteria are met.<sup>26</sup> While, at the time it issued its 45-day reservation rule, the FCC might have assumed it was acting in the consumer's best interests, Qwest believes that the upcoming

---

("OLS") Services, vendor delays (which included system/software problems identified during on-line testing) were held to constitute good cause to support an extension of time. See In the Matter of Policies and Rules Concerning Operator Service Access and Pay Telephone Compensation; Petitions Pertaining to Originating Line Screening Services, Memorandum Opinion and Order, 12 FCC Rcd. 14857, 14862 ¶ 7 (1996) (concluding that temporary waivers, granting extensions of time, were warranted for those carriers "whose . . . [Line Information Database] LIDB provider is not yet ready to offer enhanced OLS service."); Memorandum Opinion and Order, 12 FCC Rcd. 11606, 11608 ¶ 5 (1997) (where an OLS LIDB-based service provider outlined the problems it was having in the loading of data; the learnings associated with on-line testing; the need for future software modifications); and id. at 11609 ¶ 7 (grant of requested extension would "permit [the vendor] to address the technical issues" raised).

<sup>26</sup> The criteria are: (1) enforcement is not necessary to ensure that rates and practices are just, reasonable, and not unreasonably discriminatory; (2) enforcement is not necessary to protect consumers; and (3) forbearance is in the public interest. 47 U.S.C. § 160. There is no limitation found in Section 10 that suggests the vehicle can only be used in a "permanent" capacity. That is, the logic of forbearance is as

reconsideration proceeding will demonstrate that such is not the case. The lack of consumer harm associated with the current *status quo* strongly argues for allowing the number reservation processes currently in place to remain so pending the termination of the reconsideration process. Similarly, no public harm is realized by deferring the date for utilization reporting, by thousand block, to the NANPA.

In assessing whether forbearance is in the public interest, Section 10 requires the Commission to consider whether forbearance will promote competitive market conditions, including the extent to which such forbearance will enhance competition among providers of telecommunications services. Because the current operation of carriers' existing reservation practices have not affected competitive entry in any demonstrated material or negative way, and the imposition of the 45-day reservation obligations will consume resources otherwise better devoted to other pro-competitive and pro-consumer initiatives, forbearance would meet this test.

#### IV. CONCLUSION

Based on a variety of theories for relief, the Commission should grant carriers a deferral or extension of the effective date of portions of 47 C.F.R. Sections 52.15, pending the reconsideration process. Neither carriers nor consumers will be harmed by such a deferral since neither of these rules are the linchpins in the

---

compelling with respect to a temporary as a permanent forbearance. In this case, the forbearance actually operates as a form of stay or deferral.

Commission's number resource management and optimization agenda. Both law and equity support the granting of the relief requested herein.

Respectfully submitted,

QWEST CORPORATION

By: Kathryn Marie Krause  
Kathryn Marie Krause  
Suite 700  
1020 19th Street, N.W.  
Washington, DC 20036  
(303) 672-2859

Its Attorney

Of Counsel,  
Dan L. Poole

July 10, 2000

## CERTIFICATE OF SERVICE

I, Kristi Jones, do hereby certify that I have caused 1) the foregoing **QWEST CORPORATION REQUEST FOR EXPEDITED DEFERRAL OF EFFECTIVE DATE, OR ALTERNATIVELY A WAIVER OR STAY OF PORTIONS OF SOON-TO-BE EFFECTIVE RULE 47 C.F.R. SECTION 52.15(f)** to be filed electronically with the FCC by using its Electronic Comment Filing System, and 2) a courtesy copy of the **QWEST CORPORATION REQUEST** to be served, via hand delivery, upon the persons/entity listed on the attached service list.

Kristi Jones

Kristi Jones

July 10, 2000



William E. Kennard  
Federal Communications Commission  
8<sup>th</sup> Floor  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Gloria Tristani  
Federal Communications Commission  
8<sup>th</sup> Floor  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Michael K. Powell  
Federal Communications Commission  
8<sup>th</sup> Floor  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Harold Furchtgott-Roth  
Federal Communications Commission  
8<sup>th</sup> Floor  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Susan P. Ness  
Federal Communications Commission  
8<sup>th</sup> Floor  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Lawrence E. Strickling  
Federal Communications Commission  
Room 5C-345  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

L. Charles Keller  
Federal Communications Commission  
Room 6A-324  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Jeannie Grimes  
Federal Communications Commission  
Room 6A-207  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Thomas J. Sugrue  
Federal Communications Commission  
Room 3C-207  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Peter Wolfe  
Federal Communications Commission  
Room 3A-101  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Tejal Mehta  
Federal Communications Commission  
Room 6A-431  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Cheryl Callahan  
Federal Communications Commission  
Room 6A-207  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Aaron Goldberger  
Federal Communications Commission  
Room 6A-207  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

International Transcription  
Services, Inc.  
1231 20<sup>th</sup> Street, N.W.  
Washington, DC 20036